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16 Attorneys for Defendants
UBER TECHNOLOGIES, INC.
17 and OTTOMOTTO LLC

18 UNITED STATES DISTRICT COURT
19 NORTHERN DISTRICT OF CALIFORNIA
20 SAN FRANCISCO DIVISION

21 WAYMO LLC,
22 Plaintiff,
23 v.
24 UBER TECHNOLOGIES, INC.,
25 OTTOMOTTO LLC; OTTO TRUCKING LLC,
26 Defendants.

Case No. 3:17-cv-00939-WHA

**DECLARATION OF
MICHELLE YANG IN SUPPORT OF
DEFENDANTS' ADMINISTRATIVE
MOTION TO FILE UNDER SEAL**

1 I, Michelle Yang, declare as follows:

2 1. I am an attorney at the law firm of Morrison & Foerster LLP. I make this
3 declaration based upon matters within my own personal knowledge and if called as a witness, I
4 could and would competently testify to the matters set forth herein. I make this declaration in
5 support of Defendants' Administrative Motion to File Under Seal Their Opposition to Waymo's
6 Motion For Leave to File Amended List of Elected Trade Secrets, Supplemental Expert Reports,
7 and Revised Witness and Exhibit Lists ("Opposition").

8 2. I have reviewed the following documents and confirmed that only the portions
9 identified below merit sealing:

Document	Portions to Be Filed Under Seal	Designating Party
Opposition	Highlighted Portions	Plaintiff (Green)
Burnette Declaration	Entirety	Defendants Plaintiff
Chang Declaration Exhibits 1, 2, 3, 5, 9, 10, and 11	Entirety	Plaintiff (Green)

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17 3. A portion of the Burnette Declaration contains highly confidential technical
18 information relating to a portion of Ottomotto's source code, including an excerpt from that code.
19 Defendants have kept this source code confidential, and disclosure of this source code would
20 harm Defendants' competitive standing.

21 4. The green-highlighted portions of the Opposition, and the entirety of the Burnette
22 Declaration and Chang Declaration Exhibits 1, 2, 3, 5, 9, 10, and 11 contain information that has
23 been designated "Highly Confidential – Attorneys' Eyes Only" or "Confidential" by Waymo in
24 accordance with the Patent Local Rule 2-2 Interim Model Protective Order ("Protective Order"),
25 which the parties have agreed governs this case (Transcript of 3/16/2017 Hearing, page 6).
26 Defendants file this material under seal in accordance with Paragraph 14.4 of the Protective
27 Order.
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